

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

In the Matter of an Arbitration Between:	)	
PT SUMOHADIWIDJOJO,	)	CIVIL ACTION NO. 04 12646 NG
Applicant	)	RESPONDENTS' MOTION TO
(Respondent below)	)	VACATE OR REDUCE <u>EX PARTE</u>
and	)	ATTACHMENT
BSB RESIDUAL ASSETS TRUST,	)	ORAL ARGUMENT REQUESTED
BSB TRUST COMPANY, LTD., Trustee,	)	
Respondent	)	
(Claimant below).	)	
<hr/>		
CITIZENS BANK	)	
Trustee	)	
<hr/>		

Respondents BSB Residual Assets Trust and BSB Trust Company, Ltd., Trustee, (collectively "BSB") hereby move to vacate or reduce the \$388,000 ex parte attachment issued in favor of Applicant PT Sumohadiwidjojo ("PTSW") against a bank account in the name of BSB at Citizens Bank. The reasons for so moving are set forth in the Memorandum filed herewith.

**REQUEST FOR ORAL ARGUMENT**

BSB believes that oral argument could assist the Court and wishes to be heard.

**BSB RESIDUAL ASSETS TRUST  
AND BSB TRUST COMPANY, LTD.,  
TRUSTEE, Respondent**

By its attorneys,

/s/ Alison R. Aubry

---

Richard A. Johnston (BBO # 253420)  
Alison R. Aubry (BBO # 657298)  
WILMER CUTLER PICKERING  
HALE AND DORR LLP  
60 State Street  
Boston, MA 02109  
(617) 526-6000

Dated: January 19, 2005